

Alan D. Halperin, Esq.
Debra J. Cohen, Esq.
HALPERIN BATTAGLIA RAICHT, LLP
555 Madison Avenue, 9th Floor
New York, New York 10022
Phone: (212) 765-9100; Fax: (212) 765-0964
ahalperin@halperinlaw.net
dcohen@halperinlaw.net

Hearing Date: April 13, 2011 @ 11:00 am
Objection Deadline: April 6, 2011 @ 4:00 pm

Proposed Counsel to the Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

WORD WORLD, LLC,

Chapter 11

Case No. 11-10543 (SHL)

Debtor.

-----X

**NOTICE OF THE DEBTOR'S MOTION FOR ENTRY OF
AN ORDER AUTHORIZING KEY EMPLOYEE INCENTIVE
BONUS PURSUANT TO 11 U.S.C. §§ 105(a), 363(b) AND 503(c)(3)**

PLEASE TAKE NOTICE that upon the annexed motion (the "Motion"), Word World, LLC, debtor and debtor in possession, by its undersigned proposed counsel, seeks entry of an order authorizing it to pay to a key employee of the Debtor an incentive bonus, pursuant to §§ 105(a), 363(b)(1), 503(b)(1)(A)(i) and 503(c)(3) of the Bankruptcy Code, (the "Motion"), and a hearing on the Motion will be held before the Honorable Sean H. Lane, United States Chief Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 701, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court"), on **April 13, 2011 at 11:00 a.m. (Prevailing Eastern Time)** (the "Hearing"). Please note that copies of the Motion have been served on the notice parties listed therein. Additional copies can be viewed on the

Bankruptcy Court's website at www.ecf.nysb.uscourts.gov. You may also request copies by emailing cmitchell@halperinlaw.net.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system (with two hard copies delivered directly to the chambers of the Honorable Sean H. Lane) and by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with two hard copies delivered directly to Honorable Sean H. Lane), in accordance with customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served upon: (i) proposed counsel to the Debtor, Halperin Battaglia Raicht, LLP, 555 Madison Avenue, 9th Floor, New York, New York 10022, Attn: Alan D. Halperin, Esq. and Debra J. Cohen, Esq., (ii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Susan Golden, Esq.), (iii) counsel to Standard General Fund L.P., Moses & Singer LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York, 10174 (Attn: James Sullivan, Esq.), and (iv) counsel for the Official Committee of Unsecured Creditors, Klestadt & Winters, LLP, 570 Seventh Avenue, 17th Floor, New York, New York 10018, Attn: Fred Stevens, Esq., so as to be received no later than **April 6, 2011 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
March 18, 2011

WORD WORLD, LLC
By its Proposed Counsel,
HALPERIN BATTAGLIA RAICHT, LLP

By: /s/ Alan D. Halperin
Alan D. Halperin
Debra J. Cohen
555 Madison Avenue-9th Floor
New York, NY 10022-3301
Telephone (212) 765-9100
Facsimile (212) 765-0964
ahalperin@halperinlaw.net
dcohen@halperinlaw.net